

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR15-259 DWF/WK

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

v.

1. ROBERT WINFIELD ANDERSON,
a/k/a "Rob Moe," and
(18 U.S.C. § 2)
(18 U.S.C. § 371)
2. ROBERT LEVELLE FRELIX,
a/k/a "Lil' Rob," and
(18 U.S.C. § 922(g)(1))
(18 U.S.C. § 922(g)(9))
(18 U.S.C. § 924(a)(2))
(18 U.S.C. § 924(d)(1))
(28 U.S.C. § 2461(c))
3. SHANE JAMAL JACKSON,
a/k/a "Sunny,"

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

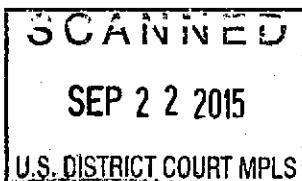
COUNT 1

(Conspiracy - Felon in Possession of Firearms and Ammunition)

From at least June 2011 through at least June 2015, in the State and District of Minnesota and elsewhere, the defendants,

ROBERT WINFIELD ANDERSON,
a/k/a Rob Moe,"
ROBERT LEVELLE FRELIX,
a/k/a "Lil' Rob," and
SHANE JAMAL JACKSON,
a/k/a "Sunny,"

knowingly and intentionally conspired with each other and others to violate Title 18, United States Code, Section 922(g)(1) and 922(g)(9), which makes it a federal crime to be in possession of a firearm and ammunition after being convicted of either a



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misdemeanor crime of domestic violence, or a crime punishable by a term of imprisonment exceeding one year.

BACKGROUND AND PURPOSE OF THE CONSPIRACY

1. During the time-frame of the conspiracy, the defendants participated in the activities of two closely associated street gangs, the Taliban and the Young N' Thuggin' (hereafter "Taliban/YNT"). At some point during the time frame of the conspiracy alleged in this Indictment, each of the defendants were convicted of offenses that make them ineligible to possess firearms.

2. The purpose of the Taliban/YNT is to make money for the gang members through criminal acts including armed robberies, drug dealing, and thefts.

3. Another purpose of the gangs was to obtain, possess, and use firearms. The defendants obtained firearms in a variety of ways, including trading drugs for guns. Prior to and during the conspiracy alleged in this Indictment, the Taliban/YNT were in an ongoing gang war with the 1-9 Dipset and Stick Up Boys gangs. This gang war resulted in the shooting deaths of numerous gang members on both sides of the conflict including 1-9 Dipset gang members Tyrone Washington, a/k/a "Ty Crack," Dacari Starr, a/k/a "Pudda Loc," Haywood Eaton, and Juwon Osborne, a/k/a "Skitz." Murder victims from the Taliban and YNT gangs included Derrick Martin, a/k/a "D-Nice," and Kyle Parker, a/k/a "K-Top."

4. In addition to murders, several gunshot woundings resulted from this gang war including the wounding of at least five 1-9 or Stick Up Boys gang members, and many Taliban/YNT gang members. For example, on July 1, 2014, defendant Anderson

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took a relative to a medical clinic on Webber Parkway in Minneapolis. While waiting for the relative to complete the appointment, at approximately 1:15 p.m., defendant Anderson left the clinic and went outside. Once outside, defendant Anderson was confronted by several individuals. Words were exchanged and one of the individuals began shooting a pistol at defendant Anderson, firing approximately 10 shots, 2 of which hit him. When asked by police investigators about the motive for the shooting, defendant Anderson replied: "you know, I got some...I got like a little funk with the 1-9, but you know." Defendant Anderson told officers that he did not know the person that shot him, and could not identify the shooter. However, defendant Anderson stated that it was possible the person who shot him was a 1-9 Dipset gang member.

5. Due to the ongoing gang war, and the need for weapons to conduct the other illegal activity described above, the defendants and other members of the Taliban/YNT conspired to illegally obtain and jointly possess firearms.

OVERT ACTS

During and in furtherance of the conspiracy, the defendants and other members of the conspiracy committed the following overt acts, among others:

1. On September 21, 2014, at approximately 5:49 p.m., defendant Robert Levelle Frelix, a/k/a "Lil' Rob," and Taliban/YNT gang members Derrick Rodgers, a/k/a "Lil' D" and Shane Jackson, a/k/a "Sunny," engaged in a gun battle with rival gang members in the 2400 block of Aldrich Avenue North in Minneapolis. Defendant Frelix was shot in the chest while shooting at members of the rival gang. Officers recovered one Glock .40 caliber pistol and two Glock 9mm pistols from the scene, two

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with extended magazines, all manufactured outside of the state of Minnesota. Recovered cartridge casings showed that the guns had been fired at the scene. Defendant Frelix, along with Defendant Jackson and other Taliban/YNT gang members, jointly possessed the pistols. At the time of this incident, defendant Frelix had been convicted of a misdemeanor crime of domestic violence. Further, at the time of this incident, both defendants Frelix and Jackson had been convicted of a felony crime punishable by imprisonment of more than one year. Accordingly, both defendants were prohibited from possessing a firearm or ammunition under federal law.

3. On June 4, 2015, defendant Anderson was driving a vehicle in Edina, Minnesota, when he was stopped by law enforcement officers. Defendant Frelix was the front seat passenger. Two members associated with the Taliban/YNT street gang were rear seat passengers. While officers were searching the vehicle, defendant Frelix, who had given the officers a false identity, fled the scene on foot and was not apprehended. Officers recovered a Glock 9mm pistol in the console between the front seats where defendants were seated. Defendants jointly possessed this firearm. At the time of this incident, both defendants were prohibited from possessing firearms and ammunition under federal law.

4. On June 12, 2015, law enforcement officers recovered a German Sports Gun Model GSG-1911, .22 caliber, semi-automatic pistol, and a 50-round magazine for a Glock pistol containing Hornaday 9mm ammunition in the apartment shared by defendants Frelix and Anderson in Plymouth, Minnesota. Both the firearm and the ammunition were manufactured outside of the state of Minnesota. Defendants jointly

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possessed the firearms and ammunition recovered from the apartment. At the time of this incident, as set forth above, both defendants were prohibited from possessing firearms and ammunition under federal law; all in violation of Title 18, United States Code, Section 371.

COUNT 2
(Felon in Possession of a Firearm)

On or about June 11, 2011, in the State and District of Minnesota, the defendant,

ROBERT WINFIELD ANDERSON,
a/k/a "Rob Moe,"

having been convicted Fifth Degree Drug Possession in Dakota County, Minnesota, in June 2009, a crime punishable by imprisonment for a term exceeding one year, aiding and abetting and being aided and abetted by another, knowingly possessed, in and affecting interstate commerce, a firearm, namely a Model 37 Winchester .410 gauge shotgun, in violation of Title 18, United States Code, Sections 2, 922(g)(1) and 924(a)(2).

COUNT 3
(Felon in Possession of a Firearm)

On or about September 21, 2014, in the State and District of Minnesota, the defendants,

ROBERT LEVELLE FRELIX,
a/k/a "Lil Rob," and
SHANE JAMAL JACKSON,
a/k/a "Sunny,"

each prohibited under federal law from possessing a firearm, as to defendant Robert Levelle Frelix, because he had previously been convicted of the following crimes, one of

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which is a misdemeanor crime of domestic violence and one of which is a crime punishable by imprisonment for a term exceeding one year, namely:

Offense	Court	Date of Conviction (on or about)
Fifth Degree Assault- Domestic Assault (Misdemeanor)	Ramsey County, Minnesota	September 2013
Repeat Violation of an Order For Protection (Felony)	Scott County, Minnesota	May 2014

and as to defendant Shane Jamal Jackson, because he had previously been convicted of Possession of a Pistol by a Prohibited Person in June 2010, in Hennepin County, Minnesota, a crime punishable by a term of imprisonment exceeding one year, aiding and abetting and being aided and abetted by each other and others, knowingly possessed, in and affecting interstate commerce, firearms, namely a Glock .40 caliber semi-automatic pistol, bearing serial number DGR505US, a Glock .40 caliber semi-automatic pistol bearing serial number RWB382, and a Glock 9mm semi-automatic pistol bearing serial number UD596, in violation of Title 18, United States Code, Sections 2, 922(g)(1), 922(g)(9) and 924(a)(2).

COUNT 4
(Felon in Possession of a Firearm)

On or about June 4, 2015, in the State and District of Minnesota, the defendants,

ROBERT WINFIELD ANDERSON,
a/k/a "Rob Moe," and
ROBERT LEVELLE FRELIX,
a/k/a "Lil Rob,"

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each prohibited under federal law from possessing a firearm, as to defendant Robert Winfield Anderson, because he had been convicted of the following crimes punishable by imprisonment for a term exceeding one year, namely:

Offense	Court	Date of Conviction (on or about)
Fifth Degree Drug Possession	Dakota County, Minnesota	June 2009
Fifth Degree Drug Possession	Hennepin County, Minnesota	October 2012

and as to defendant Robert Levelle Frelix, because he had been convicted of the following crimes, one of which is a misdemeanor crime of domestic violence and one of which is a crime punishable by imprisonment for a term exceeding one year, namely:

Offense	Court	Date of Conviction (on or about)
Fifth Degree Assault - Domestic Assault (Misdemeanor)	Ramsey County, Minnesota	September 2013
Repeat Violation of an Order For Protection (Felony)	Scott County, Minnesota	May 2014

aiding and abetting and being aided and abetted by each other and others, knowingly possessed, in and affecting interstate commerce, a firearm, namely, a Glock Model 17, 9mm caliber semi-automatic pistol, serial number SSW170, in violation of Title 18, United States Code, Sections 2, 922(g)(1), 922(g)(9) and 924(a)(2).

COUNT 5
(Felon in Possession of a Firearm)

On or about June 12, 2015, in the State and District of Minnesota, the defendants,

ROBERT WINFIELD ANDERSON,
a/k/a "Rob Moe," and

ROBERT LEVELLE FRELIX,
a/k/a "Lil Rob,"

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each prohibited under federal law from possessing a firearm, as to defendant Robert Winfield Anderson, because he had been convicted of the following crimes punishable by imprisonment for a term exceeding one year, namely:

Offense	Court	Date of Conviction (on or about)
Fifth Degree Drug Possession	Dakota County, Minnesota	June 2009
Fifth Degree Drug Possession	Hennepin County, Minnesota	October 2012

and as to defendant Robert Levelle Frelix, because he had been convicted of the following crimes, one of which is a misdemeanor crime of domestic violence and one of which is a crime punishable by imprisonment for a term exceeding one year, namely:

Offense	Court	Date of Conviction (on or about)
Fifth Degree Assault - Domestic Assault (Misdemeanor)	Ramsey County, Minnesota	September 2013
Repeat Violation of an Order For Protection (Felony)	Scott County, Minnesota	May 2014

aiding and abetting and being aided and abetted by each other and others, knowingly possessed, in and affecting interstate commerce, a firearm, namely a German Sports Gun Model GSG-1911, .22 caliber, semi-automatic pistol, serial number A550424, in violation of Title 18, United States Code, Sections 2, 922(g)(1), 922(g)(9) and 924(a)(2).

COUNT 6
(Felon in Possession of Ammunition)

On or about June 12, 2015, in the State and District of Minnesota, the defendants,

ROBERT WINFIELD ANDERSON,

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a/k/a "Rob Moe," and
ROBERT LEVELLE FRELIX,
a/k/a "Lil Rob,"

each prohibited under federal law from possessing ammunition, as to defendant Robert Winfield Anderson, because he had been convicted of the following crimes punishable by imprisonment for a term exceeding one year, namely:

Offense	Court	Date of Conviction (on or about)
Fifth Degree Drug Possession	Dakota County, Minnesota	June 2009
Fifth Degree Drug Possession	Hennepin County, Minnesota	October 2012

and as to defendant Robert Levelle Frelix, because he had been convicted of the following crimes, one of which is a misdemeanor crime of domestic violence and one of which is a crime punishable by imprisonment for a term exceeding one year, namely:

Offense	Court	Date of Conviction (on or about)
Fifth Degree Assault - Domestic Assault (Misdemeanor)	Ramsey County, Minnesota	September 2013
Repeat Violation of an Order For Protection (Felony)	Scott County, Minnesota	May 2014

aiding and abetting and being aided and abetted by each other and others, knowingly possessed, in and affecting interstate commerce, ammunition, namely Hornaday 9mm bullets, in violation of Title 18, United States Code, Sections 2, 922(g)(1), 922(g)(9) and 924(a)(2).

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FORFEITURE ALLEGATIONS

If convicted of Counts 1 through 6 of this indictment, the defendants,

ROBERT WINFIELD ANDERSON,

a/k/a "Rob Moe,"

ROBERT LEVELLE FRELIX,

a/k/a "Lil Rob,"

and

SHANE JAMAL JACKSON,

a/k/a "Sunny,"

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm with accessories or any ammunition involved in or used in any knowing violation of sections 922(g)(1) or 922(g)(9), including the following firearms and ammunition: a Winchester Model 37 .410 gauge shotgun, a Glock 9 millimeter semi-automatic pistol, serial number SSW170, a Glock .40 caliber semi-automatic pistol, bearing serial number DGR505US, a Glock .40 caliber semi-automatic pistol bearing serial number RWB382, and a Glock 9mm semi-automatic pistol bearing serial number UD596a German Sports Gun Model GSG-1911, .22 caliber, semi-automatic pistol, serial number A550424, a Glock extended magazine, Hornaday 9mm ammunition, and a German Sports Gun Model GSG-1911, .22 caliber, semi-automatic pistol, serial number A550424.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON